

ALABAMA PUBLIC SERVICE COMMISSION

COUNTY OF Fulton
STATE OF Georgia

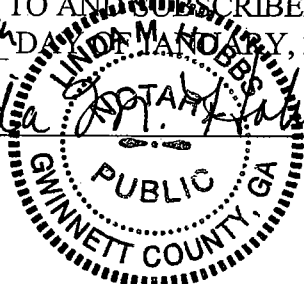
BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Kenneth L. Ainsworth who being by me first duly sworn deposed and said that he/she is appearing as a witness on behalf of BellSouth Telecommunications, Inc. before the Alabama Public Service Commission in Docket No. 29054, IN RE: Implementation of the Federal Communications Commission's Triennial Review Order (Phase II - Local Switching for Mass Market Customers), and if present before the Commission and duly sworn, his/her statements would be set forth in the annexed direct testimony consisting of 39 pages and 3 exhibits.

Kenneth L. Ainsworth
Kenneth L. Ainsworth

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 19th DAY OF NOVEMBER, 2004

Linda M. Hobbs Notary Public



Notary Public, Gwinnett County, Georgia
My Commission Expires March 17, 2007

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF KENNETH L. AINSWORTH
3 BEFORE THE ALABAMA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 29054 (PHASE II)
5 JANUARY 20, 2004
6

7 Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR
8 POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.
9 ("BELLSOUTH").
10

11 A. My name is Ken L. Ainsworth. My business address is 675 West Peachtree
12 Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations
13 for BellSouth.
14

15 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE WITH
16 BELLSOUTH.
17

18 A. I have over thirty-five years experience in the telecommunications industry. My
19 experience covers a wide range of network centers as well as outside plant
20 construction. Specifically, I have managed and/or supported the following
21 network centers: Switching Control Center, Special Service Center, Central
22 Office Operations, Access Customer Advocate Center, Facility Management
23 Administrative Center, Circuit Order Control Center, Network Operations Center,
24 Major Account Center, 911 Center, and the Customer Wholesale Interconnection
25 Network Services Center. In addition, I deployed the Work Force Administration

1 ("WFA") system, which is used by these centers to track the status of certain
2 activities performed by BellSouth's Network personnel. I am currently a Director
3 for Interconnection Services directly supporting the Local Carrier Service Center
4 ("LCSC") and Customer Wholesale Interconnection Services ("CWINS") Centers
5 regarding pre-ordering, ordering, provisioning, and maintenance activities for the
6 wholesale market. I have participated in and provided technical assistance to
7 numerous Competitive Local Exchange Carrier ("CLEC") workshops on issues
8 dealing with pre-ordering, ordering, provisioning, and maintenance of resold
9 services and unbundled network elements.

10
11 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

12
13 A. My testimony will demonstrate two main points: (1) BellSouth has in place a
14 proven, seamless, high quality individual hot cut process to handle Unbundled
15 Network Element Loop ("UNE-L") volumes likely to result if BellSouth obtains full
16 relief from unbundled circuit switching; and (2) BellSouth has in place a batch hot
17 cut process that provides additional ordering efficiencies and the same proven,
18 seamless, high quality migrations as individual hot cuts to convert the embedded
19 base of Unbundled Network Element Platform ("UNE-P") arrangements to UNE-L
20 arrangements if BellSouth obtains full relief from unbundled circuit switching.

21
22 Q. BASED ON THE VOLUME OF TESTIMONY FILED ON THE HOT CUT ISSUE,
23 SHOULD THE ALABAMA PUBLIC SERVICE COMMISSION ("COMMISSION")
24 INFER THAT A "HOT CUT" IS A DIFFICULT OR CUMBERSOME PROCESS?

1 A. Absolutely not. A hot cut, simply defined, is moving a jumper from one location
2 to another. The hot cut itself involves basic network functions and skills that are
3 used repeatedly in BellSouth's network every day. The extensive number of
4 customers being served in Alabama by a combination of a BellSouth loop and a
5 CLEC switch demonstrates that BellSouth has a hot cut process that works.

6
7 Q. HAS THE COMMISSION REVIEWED BELL SOUTH'S HOT CUT PROCESS
8 BEFORE?

9
10 A. Yes. This portion of the case should be familiar to the Commission. The
11 Commission expended a great deal of time and energy reviewing the ordering
12 and provisioning of hot cuts in BellSouth's 271 case. In that case, the
13 Commission found that BellSouth provides CLECs nondiscriminatory access to
14 UNE loops, provided via a hot cut process.

15
16 **I. BELL SOUTH'S HOT CUT PROCESSES**

17
18 **A. General Overview of BellSouth's Different Hot Cut Processes**

19
20 Q. GENERALLY, WHAT TYPES OF HOT CUT PROCESSES AND WHAT TYPES
21 OF COORDINATION LEVELS DOES BELL SOUTH OFFER CLECS?

22
23 A. BellSouth provides three (3) different hot cut processes and three (3) different
24 levels of coordination. Despite this variety of service offerings, however, the
25 actual hot cut remains a simple, straightforward task – and a task BellSouth can

1 perform at high volumes with a high degree of accuracy and speed.

2
3 Q. WHAT ARE THE THREE (3) DIFFERENT TYPES OF HOT CUT PROCESSES
4 BELLSOUTH OFFERS?

5
6 A. BellSouth offers CLECs the following types of hot cuts: (1) individual hot cuts; (2)
7 project hot cuts; and (3) batch hot cuts.

8
9 Q. PLEASE BRIEFLY DESCRIBE THE INDIVIDUAL, PROJECT, AND BATCH HOT
10 CUT PROCESSES.

11
12 A. An individual hot cut service request is for a particular end-user account and is
13 available for both residence and business service lines. Service requests for
14 individual accounts may include single or multiple lines. Simply put, the
15 individual account service request will process a single order for a single end-
16 user.

17
18 The project hot cut is for cuts involving 15 or more lines to a single end-user. To
19 ensure an efficient cut, BellSouth involves a Customer Care Project Manager
20 ("CCPM") to coordinate the different work functions. The criteria for project hot
21 cuts can be found at

22 http://www.interconnection.bellsouth.com/guides/html/other_guides.html

23
24 The batch hot cut service request (which is interchangeably referred to as the
25 "bulk" migration process) provides efficient processing for large volume

migrations of UNE-P service to UNE-L service and is particularly suited to the migration of an embedded base of UNE-P circuits to UNE-L circuits. The batch hot cut process applies to migrations of multiple accounts for the same service type within a specific wire center. The batch process combines ordering efficiencies and project management support with a proven hot cut provisioning process. BellSouth's batch hot cut process can be found at

<http://www.interconnection.bellsouth.com/guides/unedocs/BulkManpkg.pdf>

Q. PLEASE DESCRIBE THE DIFFERENT LEVELS OF COORDINATION BELL SOUTH OFFERS AND THE PROCESSES TO WHICH THEY APPLY.

A. BellSouth offers CLECs three (3) hot cut coordination levels: (1) coordinated / time specific, (2) coordinated, and (3) non-coordinated.

COORDINATED / TIME SPECIFIC hot cuts require BellSouth to convert the CLEC account on a specific date and at a specific time designated by the CLEC.

When the CLEC elects this option, BellSouth contacts the requesting CLEC 24 to 48 hours prior to the due date to verify that BellSouth's service order information agrees with the CLEC's request. At that time, BellSouth also confirms no jeopardy situation exists (for either the CLEC or for BellSouth), validates the specific conversion time requested, and provides to the CLEC the status of any dial tone test (that is, BellSouth's test of dial tone provided by the CLEC's switch).

1 On the due date, the CWINS Center contacts the CLEC prior to the established
2 conversion time for a final validation that the migration is still a “go.” The
3 BellSouth CWINS technician communicates with BellSouth’s Network groups at
4 the specified conversion time and makes the execution request to perform the
5 hot cut. The CWINS technician stays on the call, awaiting Network completion
6 notification. When the technician in BellSouth’s Network group completes the hot
7 cut, that technician notifies the CWINS technician who documents the hot cut
8 completion. At this point, the hot cut is complete in BellSouth’s network.

9
10 Once the hot cut is complete, the CWINS technician attempts to notify the CLEC
11 for acceptance of the order. “Acceptance” means that the CLEC agrees that the
12 order has been fulfilled successfully and that it is appropriate for BellSouth to
13 close the order as complete. Once BellSouth confirms CLEC acceptance, or
14 default acceptance occurs (e.g., BellSouth never hears back from the CLEC), the
15 pending service orders are completed in BellSouth’s systems by the CWINS
16 technician.

17
18 Coordinated/Time Specific is available for individual and project hot cuts.

19
20 COORDINATED hot cuts require BellSouth to convert the CLEC’s customer
21 account on a date specified by the CLEC and a best effort time frame negotiated
22 by the parties. For coordinated hot cuts, BellSouth contacts the requesting
23 CLEC 24 to 48 hours prior to the due date to verify that BellSouth’s service order
24 information agrees with the CLEC’s request. At that time, BellSouth also
25 confirms no jeopardy situation exists (either for the CLEC or for BellSouth) and

1 provides to the CLEC the status of any dial tone test performed (that is,
2 BellSouth's test of dial tone from the CLEC's switch). Finally, during this call
3 which occurs during the 24 to 48 hours prior to the due date, the parties verify the
4 targeted time frame on the due date that the hot cut will be performed.

5
6 On the due date, CWINS will contact the CLEC prior to the conversion time for a
7 final validation that the migration is still a "go." The BellSouth CWINS technician
8 communicates with BellSouth's Network group prior to the conversion being
9 started. Once all BellSouth personnel are in communication, the CWINS
10 technician will make the execution request to perform the hot cut and stay on the
11 call, awaiting Network completion notification. When the Network technician
12 completes the hot cut, that technician notifies the CWINS technician who
13 documents the completion. At this point, the hot cut is complete within
14 BellSouth's network. The CWINS technician then attempts to notify the CLEC for
15 acceptance. As discussed earlier, acceptance in this sense means that the
16 CLEC agrees that the order has been fulfilled successfully and that is appropriate
17 that BellSouth close the order as complete. Once CLEC acceptance is
18 confirmed or default acceptance occurs, the pending service orders are
19 completed by the CWINS technician.

20
21 Coordinated service is available on individual, project, and batch hot cuts.

22
23 NON-COORDINATED hot cut requests are converted by BellSouth's Network
24 personnel during normal business hours (8 a.m. – 5 p.m.) at various times on the
25 due date based on the Network technicians' work load activity and schedule.

1 Once BellSouth network personnel complete the non-coordinated hot cut, the
2 technician completes the work order that, in turn, generates a notification (either
3 by facsimile or by e-mail) to the CLEC that the conversion is complete.

4
5 Non-coordinated service is available on individual, project, and batch hot cuts.

6
7 Q. PLEASE EXPLAIN THE BENEFITS OF EACH COORDINATION LEVEL.

8
9 A. COORDINATED/TIME SPECIFIC hot cuts allow CLECs to schedule conversions
10 at a CLEC-requested time on the due date. This gives the CLEC an opportunity
11 to schedule a specific conversion time with certain end-user customers based on
12 the business needs of the CLEC or the end-user. The coordinated / time specific
13 hot cut is the most detailed of the three (3) types of conversions and, as the
14 Federal Communications Commission ("FCC") held, is not something BellSouth
15 is required to "provide at no charge." *Georgia/Louisiana Order*, ¶ 222.

16
17 COORDINATED hot cuts assure the highest level of monitoring and interaction
18 by BellSouth with the CLEC during the provisioning process culminating in direct
19 completion notification at the completion of the conversion activity. The
20 coordinated hot cut allows CLECs the added value of the coordination functions
21 and direct notification and acceptance activities at the conclusion of the
22 conversion. When CLECs desire coordination assurances, direct notification and
23 acceptance opportunities, the coordinated conversion would be a good choice.

24
25 NON-COORDINATED hot cuts, as suggested by the name, provide basic hot cut

1 conversion processing without coordination functionality. This is not meant to
2 suggest that BellSouth's provisioning activities are not internally coordinated for
3 this type hot cut, because they are. BellSouth does not, however, coordinate its
4 conversion activities with the CLEC at the time of the hot cut. This type of hot cut
5 allows a CLEC to convert its end-user from BellSouth's switch to the CLEC's
6 switch over an unbundled loop (that is, the UNE-L) at the lowest possible cost to
7 the CLEC. Network non-coordinated provisioning functions are still performed by
8 BellSouth's Network personnel to assure a quality conversion. Completion
9 notification is triggered by service order activity completion by Network
10 personnel, which propagates either a facsimile or e-mail conversion completion
11 notification (as specified by the CLEC) to the CLEC.

12
13 **B. BellSouth's Individual Hot Cut Process**

14
15 Q. HAS THE COMMISSION REVIEWED BELL SOUTH'S INDIVIDUAL HOT CUT
16 PROCESS BEFORE?

17
18 A. Absolutely. As I mentioned briefly at the outset, this Commission, as well as the
19 FCC, reviewed BellSouth's hot cut process during BellSouth's 271 applications
20 and determined that BellSouth's hot cut process provided CLECs with
21 nondiscriminatory access to unbundled loops. The provisioning process I
22 discuss here is the same process reviewed during the 271 case.

23
24 Q. PLEASE EXPLAIN BELL SOUTH'S INDIVIDUAL HOT CUT PROCESS.

1 A. BellSouth has a seamless individual hot cut process that ensures minimal end-
2 user service outage. A flow-chart of the individual hot cut process is attached to
3 my testimony as Exhibit KLA-1. BellSouth's process provides for the following:

- 4
- 5 1. Pre-wiring and pre-testing of all wiring prior to the due date
- 6 2. Verification of dial tone from the CLEC's switch
- 7 3. Verification of correct telephone number from the BellSouth and CLEC
- 8 switch using a capability referred to as Automatic Number Announcement
- 9 ("ANAC")
- 10 4. Monitoring of the line prior to actual wire transfer to ensure end-user
- 11 service is not interrupted
- 12 5. Notification to the CLEC that the transfer has completed
- 13

14 In addition to the activities listed above, coordinated hot cuts (including
15 coordinated/time specific hot cuts) also include:

- 16
- 17 1. Notification to the CLEC of CLEC wiring errors, dial tone, or ANI problems
- 18 2. Verification of end-user information with the CLEC prior to the conversion
- 19 3. Verification with the CLEC of cut date and or time 24 – 48 hours prior to
- 20 the conversion date
- 21 4. Joint acceptance testing, if requested by the CLEC.
- 22

23 Q. DOES BELL SOUTH CHECK FOR DIAL TONE PRIOR TO A HOT CUT?

24

25 A. Yes. BellSouth's processes require that a dial tone check be performed prior to a

1 hot cut. Hot cuts involving designed loops are tested for CLEC dial tone 24-48
2 hours before due date. If no dial tone is found, the CWINS Center technician
3 notifies the CLEC of the problem in order for the CLEC to have time to correct
4 the problem prior to the due date and not jeopardize the hot cut. Coordinated hot
5 cuts involving non-designed loops are tested for CLEC dial tone by the central
6 office ("CO") technician when they perform the pre-wiring for the hot cut. If no
7 dial tone is found, the CO technician places the order in jeopardy and the CWINS
8 technician notifies the CLEC of the problem in order for the CLEC to have time to
9 correct the problem prior to the due date and not jeopardize the hot cut.

10
11 For non-coordinated hot cuts, BellSouth checks for dial tone before the due date
12 but does not require CLEC notification of a no dial tone problem. BellSouth's CO
13 personnel check for CLEC dial tone when they perform pre-due date wiring
14 functions. The CO technician places the order in jeopardy if no CLEC dial tone is
15 present. The BellSouth CO technician checks again for CLEC dial tone on due
16 date and if dial tone is present, the CO technician performs the hot cut. If on the
17 due date, there is no CLEC dial tone, the hot cut does not go forward and the
18 BellSouth technician codes the order as a Missed Appointment ("MA") due to
19 CLEC problems. The CLEC is then notified, (either electronically, if the CLEC
20 placed its Local Service Request ("LSR") electronically, or by fax if the CLEC
21 placed its LSR manually), that the order is in MA status and that the CLEC must
22 either supplement its order for a new due date or cancel its order. Even in non-
23 coordinated cuts, the customer is not taken out of service if there is no dial tone
24 on the receiving end of the cut.

1 Regardless of which type of hot cut is ordered by the CLEC, BellSouth also
2 performs a check for CLEC dial tone immediately prior to the hot cut to ensure
3 that dial tone is present.
4

5 Q. DOES THE HOT CUT PROCESS CAUSE SERVICE DISRUPTIONS? IF SO,
6 DOES THAT MEAN THAT BELL SOUTH'S PROCESS IS NOT SEAMLESS?
7

8 A. The very nature of a hot cut is that there is a physical transfer of the loop facility
9 serving the end-user from the existing central office switch (that is, BellSouth's
10 switch) to the CLEC's switch. This physical transfer interrupts dial tone and the
11 end-user's ability to place or receive calls during this process only during the time
12 the loop is disconnected from BellSouth's switch but is not yet connected to the
13 CLEC's switch. Due to the pre-conversion work that BellSouth performs before
14 the actual transfer from switch to switch, the conversion time to make this
15 physical transfer from November 2002 to October 2003 has averaged 8:05
16 minutes in Alabama according to BellSouth Service Quality Measurements
17 ("SQM") reports. This indicates the end-user would be without calling capability
18 for only 8:05 minutes. The CLEC performs required number porting activities
19 once the transfer from BellSouth's switch to the CLEC's switch is effectuated.
20 BellSouth witness Mr. Varner will discuss the specifics of performance data.
21

22 Q. PLEASE ADDRESS HOW THE PROCESS CHANGES WHEN COSMIC
23 FRAMES OR MULTIPLE FRAMES ARE INVOLVED IN THE CUT.
24

25 A. First, let me explain that the so-called "COSMIC" frame is a newer style modular

1 Main Distributing Frame ("MDF") whose assignment records are housed in a
2 system called SWITCH/FOMS ("Frame Order Management System"). Using a
3 "punch down tool" on this style frame, temporary connections referred to as
4 "jumpers" are made by punching the jumper wire onto special terminals that strip
5 the insulation and cut off any excess jumper wire in one stroke. This takes less
6 time than for older style frames that required soldered connections or so-called
7 "wire wrapped" connections. Wire wrapped connections required a special tool
8 that wound the jumper wire around a metal terminal once the technician had
9 removed the plastic insulation from the jumper wire. SWITCH/FOMS also
10 contains assignment algorithms meant to minimize the length of jumpers
11 connecting loops and switch ports thereby reducing work times required to place
12 jumpers. Thus, work times to complete required activities for an unbundled loop
13 order and the number of wiring connections that have to be made in the CO vary
14 depending on the frame type and/or the location of the demarcation point in a
15 particular CO between BellSouth's network and the CLEC's collocation
16 arrangement. The location of the demarcation influences work times because
17 the placement of the demarcation affects the total quantity of jumpers that
18 BellSouth's technicians must place to effectuate the transfer of an unbundled
19 loop. Non-designed loops can require from 1 to 3 jumpers to make the
20 connection from the CLEC demarcation point to the loops appearance on the
21 MDF while designed loops can require from 2 to 6 jumpers to make this
22 connection. Regardless of the arrangement, all of the jumpers are installed prior
23 to the actual hot cut occurring.

24
25 Q. HOW IS A CLEC NOTIFIED THAT BELL SOUTH HAS COMPLETED ITS

1 PORTION OF THE HOT CUT AND THAT THE CLEC SHOULD COMMENCE
2 ACTIVITIES TO PORT THE TELEPHONE NUMBER FROM BELL SOUTH'S
3 NETWORK TO THE CLEC'S NETWORK?
4

5 A. For coordinated hot cut conversions, the CLEC is directly notified by a telephone
6 call from CWINS Center personnel. This notification occurs after the conversion
7 is complete and has actually taken place. For the BellSouth region from October
8 2002 to September 2003, BellSouth averaged 1:43 minutes to notify the CLEC to
9 port the number after the conversions were completed. Exhibit KLA-2 sets forth
10 the notification times for the past year.
11

12 For non-coordinated conversions, BellSouth notifies the CLEC via facsimile or e-
13 mail (whichever the CLEC requests) at the completion of the BellSouth Network
14 technician's work activity. Remember, however, that non-coordinated hot cuts
15 only are an option for the CLEC for whom economics are of the utmost
16 importance. For CLECs who want virtually real-time notification, BellSouth
17 provides that option as well.
18

19 Q. WHEN DOES CLEC ACCEPTANCE OCCUR IN THE HOT CUT PROCESS?
20

21 A. Once BellSouth confirms CLEC acceptance, the BellSouth CWINS technician
22 completes the pending service orders in BellSouth's systems. The service order
23 also is completed in BellSouth's system if a default acceptance condition occurs.
24 Specifically, if the CLEC is notified before 3:00 p.m. that the hot cut is complete,
25 the CLEC has until 6:00 P.M. to accept. If the CLEC is notified of completion

1 after 3:00 P.M., the CLEC has until 12:00 P.M. of the next business day to accept
2 the hot-cut. If the hot-cut is not accepted within these timeframes, the orders are
3 closed by default acceptance.
4

5 Q. DOES THE HOT CUT PROCESS HAVE ANY NEGATIVE IMPACT ON E911,
6 NUMBER PORTABILITY ADMINISTRATION CENTER ("NPAC"),
7 PROVISIONING, REPAIR, BILLING, OR OTHER DATABASES?
8

9 A. No. Updates to the E911 database are triggered by disconnect orders closed in
10 Service Order Communication System ("SOCS"). These same disconnect
11 completions, along with the completion of all related orders, update all customer
12 service records in the downstream systems including the provisioning, repair and
13 billing information databases. BellSouth's process has no negative impact on the
14 NPAC database. Once the conversion orders are issued, BellSouth places a
15 concur message in the Local Number Portability ("LNP") gateway awaiting the
16 CLECs' subscription to create the port. Once the gateway receives the create
17 message from the CLEC, BellSouth will return the concur message that is
18 already pending in the gateway. This process allows the CLEC to activate the
19 port on the agreed upon date.
20

21 Q. IS BELL SOUTH'S INDIVIDUAL HOT CUT PROCESS EFFECTIVE?
22

23 A. Yes. This Commission and the FCC confirmed the effectiveness of BellSouth's
24 hot cut process during BellSouth's Section 271 Application approval process.
25 This Commission, eight other state commissions, and the FCC all found

1 BellSouth's hot cut process nondiscriminatory, timely, accurate, and effective.
2 Further, BellSouth's hot cut process was reviewed as part of the third party
3 testing performed by KPMG. That testing confirmed that BellSouth adhered to its
4 process.

5
6 Q. HAS THE HOT CUT PROVISIONING PROCESS BEEN REVIEWED
7 RECENTLY?

8
9 A. Yes. The most recent review of the hot cut provisioning process was done
10 during the Florida Operational Support System ("OSS") Third Party Test.
11 BearingPoint, formerly KPMG Consulting, did review the hot cut provisioning
12 process during the Florida Test. They assessed it from a process standpoint in
13 the PPR-9 Test Report Section which can be found beginning on page 423 of the
14 Florida Test Final Report. Additionally, they observed live hot cuts both from a
15 BellSouth and a CLEC perspective in the TVV-4 Test Report which can be found
16 beginning on page 448 of the Florida Test Final Report. The evaluation criteria
17 or test points for the hot cut observations can be found beginning on page 458 of
18 the report.

19
20 Q. WHAT WERE THE FINDINGS OF THE FLORIDA TEST FINAL REPORT?

21
22 A. BearingPoint determined that BellSouth had an adequate and effective loop
23 conversion or hot cut process. They found and reported on page 448 that:

24
25 "Loop Conversions (also referred to as Loop Migrations or Hot Cuts) – Existing

1 BellSouth lines are migrated to the ALEC collocation facility inside a BellSouth
2 central office. BellSouth frame technicians migrate the lines at the main
3 distribution frame (MDF) on the due date. The conversion is expected to occur
4 on the Frame Due Date for non-coordinated conversions. During coordinated
5 conversions, the cut occurs on the Frame Due Date and starts at the Frame Due
6 Time (FDT) as indicated on the LSR. Cases involving Integrated Loop Carrier
7 (IDLC) migrations require outside technicians to perform field work on the due
8 date and time.”
9

10 To establish that this process was adequate to migrate CLEC customers,
11 BearingPoint observed live hot cuts. For many of hot cut observations, CLECs
12 conducting business in Florida allowed BearingPoint to observe commercial
13 installations of their orders. Data was also gathered during field inspections of
14 hot cut activities in BellSouth central offices and from the CWINS Center. This
15 data was logged and analyzed to determine if BellSouth’s hot cut process along
16 with its methods and procedures were adequate for the migration of customers
17 from a BellSouth switch to a CLEC switch.
18

19 Beginning on page 458 of the Florida Test Final Report, BearingPoint listed their
20 specific test points or evaluation criteria. First, they assessed whether the
21 BellSouth technicians provisioned hot cuts in accordance with documented
22 methods and procedures. BearingPoint observed live hot cuts and determined
23 that the BellSouth technicians satisfactorily provisioned the hot cuts in
24 accordance with BellSouth documented methods and procedures. Second,
25 BearingPoint assessed BellSouth’s performance from an SQM perspective. To

1 achieve this, BearingPoint evaluated Bellsouth's ability to meet the coordinated
2 customer conversion interval performance benchmark which is the P-7 SQM.
3 Additionally, BearingPoint assessed the P-7A SQM metric for Coordinated
4 Customer Conversions, the P-3 SQM metric for Percent Missed Installation
5 Appointments, the P-9 SQM metric for Percentage Troubles received within 30
6 Days of Service Order Completion, and the P-7C SQM metric for Percent
7 Provisioning Troubles Received Within Seven Days of a Completed Service
8 Order. For each measure, BearingPoint found that BellSouth indeed exceeded
9 the benchmark or parity standard for the observations that they assessed during
10 the test period. At the end of the testing, BearingPoint was able to confirm the
11 adequacy and effectiveness of BellSouth's hot cut process by rating each of the
12 test points or evaluation criteria as satisfied. This satisfactory rating provides an
13 endorsement for BellSouth's hot cut process.

14
15 Q. IS THERE COMMERCIAL USAGE OF BELL SOUTH'S INDIVIDUAL HOT CUT
16 PROCESS?

17
18 A. Certainly. As the FCC has repeatedly held, the most probative evidence of the
19 availability of a functionality is actual commercial usage. *Bell Atlantic New York*
20 *Order*, at ¶ 89. BellSouth performed over 300,000 hot cuts between November
21 2000 and September 2003. Recently, in Florida, BellSouth converted over 260
22 lines for a single CLEC in one (1) central office on a single day. On the same
23 day, BellSouth converted a total of over 975 lines in ten (10) central offices in the
24 same general area for the same CLEC. This level of commercial usage alone
25 demonstrates BellSouth's ability to perform hot cuts at existing and foreseeable

1 volumes.

2
3 Q. HOW IS BELL SOUTH'S PERFORMANCE ON COORDINATED HOT CUTS?

4
5 A. Superior. BellSouth witness Alphonso Varner discusses BellSouth's
6 performance in detail, but I can tell you that BellSouth has performed at a very
7 high level of consistency and quality in regards to hot cuts. For the period
8 November 2002 through October 2003, BellSouth performed 64 coordinated hot
9 cuts in Alabama. Of these, 94 % of the hot cuts were completed within 15
10 minutes.

11
12 Q. THE FCC INDICATED THAT NEITHER THE STATE'S NOR FCC'S 271
13 APPROVAL IS APPLICABLE TO A SITUATION IN WHICH CLECS WILL NOT
14 HAVE UNBUNDLED CIRCUIT SWITCHING OR UNE-P. DO YOU AGREE?

15
16 A. No. This Commission reviewed BellSouth's hot cut process and determined that
17 it provided CLECs non-discriminatory access to UNE loops. The fact that
18 volumes of UNE loops may increase does not change the fact that BellSouth's
19 process is nondiscriminatory and complies with all of BellSouth's obligations
20 under the Act as this Commission and the FCC confirmed. The Commission
21 does not need to revisit the process -- rather, if the Commission confirms that, as
22 BellSouth witness Mr. Heartley and I demonstrate, BellSouth's process is fully
23 scalable to meet forecasted demands, then the process is compliant.

1 **C. BellSouth's Project Hot Cut Process**

2
3 Q. PLEASE DESCRIBE BELLSOUTH'S PROJECT HOT CUT PROCESS.
4

5 A. Project conversions are available when the CLEC seeks to convert 15 or more
6 lines to the same end-user. When the CLEC requests a project conversion for
7 fifteen or more loops to be provisioned on a single individual order, a CWINS
8 Center technician and a CCPM are assigned to the order and the order is
9 identified in the WFA system for Due Date tracking. The CWINS Center
10 technician or CCPM reviews the order for accuracy and queries associated
11 systems for order status. The CWINS Center technician or CCPM contacts the
12 CLEC prior to the due date to confirm or negotiate the actual due date
13 conversion time. The CWINS Center technician or CCPM then contacts any
14 associated work group to schedule the conversion.
15

16 On the Due Date, the CWINS technician verifies that the required personnel are
17 scheduled for the conversion time. The CWINS Center technician sets up
18 communications with required conversion personnel to begin service cutover to
19 the CLEC. Upon completion of the cutover activity, the CLEC is notified. With
20 CLEC concurrence, the service order is completed.
21

22 The CWINS Center technician completes the order in BellSouth's systems after
23 concurrence of the CLEC. Any trouble conditions, made known by the CLEC
24 related to the conversion, are resolved with the CLEC before the order is closed.
25

1 Q. IS THE PROVISIONING PROCESS FOR PROJECT HOT CUTS THE SAME AS
2 FOR INDIVIDUAL HOT CUTS?

3
4 A. Yes. The "*Project Manager Implementation Guidelines*" posted on the Guides
5 website http://www.interconnection.bellsouth.com/guides/html/other_guides.html,
6 provides product-specific information.

7
8 **D. BellSouth's Batch Hot Cut Process**

9
10 Q. PLEASE DESCRIBE BELL SOUTH'S BATCH HOT CUT PROCESS.

11
12 A. BellSouth's "UNE-P to UNE-L Bulk Migration" is a batch hot cut process that
13 CLECs may use when migrating existing multiple non-complex UNE-P services
14 to a UNE-L offering. The batch hot cut process offers electronic ordering
15 capability and adds project-management services to the basic proven hot cut
16 provisioning process.

17
18 With respect to electronic ordering, CLECs can submit the Bulk Migration
19 Request electronically, which allows the migration of multiple UNE-Ps to a UNE-L
20 offering without submitting individual LSRs. BellSouth witness Mr. Pate
21 describes this ordering mechanism in his direct testimony. I will address the
22 project management services that are included in BellSouth's batch hot cut
23 process in greater detail below.

24
25 Q. HOW DOES THE BATCH MIGRATION PROCESS WORK?

1 A. During the pre-ordering process, the CLEC submits a Notification Form to
2 BellSouth's CCPM for UNE-P accounts to be converted to UNE-L within a single
3 wire center. The CCPM reviews the Notification Form for errors and assigns a
4 Bulk Order Project Identifier ("BOPI") and forwards the Notification Form to the
5 Network Single Point of Contact ("SPOC") who assigns due dates to accounts
6 and returns the Notification Form to the CCPM, who then returns the Notification
7 Form to the CLEC.

8
9 Q. DURING THE PRE-ORDERING PROCESS, ARE THERE SPECIFIC
10 INTERVALS FOR THE RETURN OF THE NOTIFICATION FORM TO THE
11 CLEC?

12
13 A. Yes. Those intervals are as follows:

- 14 • Up to 99 Telephone Numbers, 7 business days
- 15 • 100 – 199 Telephone Numbers, 10 business days
- 16 • 200 or more Telephone Numbers, the CCPM will negotiate with SPOC
- 17 • Multiple Batch Requests from multiple CLECs may be submitted
- 18 simultaneously
- 19 • Maximum Telephone Numbers per Batch Request is $99 \times 25 = 2475$

20
21 Q. WHEN IS THE FIRST DUE DATE ASSIGNED?

22
23 A. The first due date to be assigned by the SPOC will be a minimum of 17 business
24 days after the Notification Form is returned to the CLEC. In other words, there
25 are 3 days for the CLEC to submit a clean bulk LSR into their electronic system,

1 and then, there is a minimum of 14 days after the LSR is submitted to the first
2 service order due date.

3
4 The ordering activity is such that the LCSC will use its normal process to handle
5 orders that fall out for manual or partial handling.

6
7 Q. PLEASE DESCRIBE THE ROLE THE CCPM PLAYS IN THE BATCH
8 MIGRATION PROCESS AND THE EFFICIENCIES GAINED FROM PROJECT
9 MANAGEMENT.

10
11 A. The role of the CCPM in the batch migration process is to be the SPOC as the
12 liaison between the CLEC and network operations. They coordinate due dates,
13 advise of potential delays or problems, and advise of completion of the project.
14 In the batch hot cut provisioning process, the BellSouth CCPM provides CWINS
15 and the network operations group with notification of planned bulk activity,
16 monitors status of the order(s), interfaces with the CLEC and BellSouth groups
17 during the process, and tracks orders and the project until it is complete.
18 The CCPM is the party responsible in the first instance for ensuring successful
19 completion of the process.

20
21 Q. PLEASE DESCRIBE THE PROVISIONING PROCESS IN THE BATCH
22 MIGRATION PROCESS.

23
24 A. The batch hot cut provisioning process is the same as the individual hot cut
25 provisioning process. The benefits of this are obvious – the CLEC is afforded

1 access to the same nondiscriminatory, 271-compliant process that this
2 Commission approved in 2002.

3
4 Q. WILL BELLSOUTH PROVIDE THE CLEC A WINDOW OF TIME WITHIN
5 WHICH BATCH HOT CUTS WILL BE COMPLETED?

6
7 A. Yes. Because the batch hot cut process provides the assistance of the CCPM, a
8 CLEC may request, through the CCPM, that some of their coordinated
9 conversions, such as business accounts, be converted within a specified window
10 of time. The CCPM will work with the centers and network groups to make best
11 efforts to accommodate the request.

12
13 A CLEC also may request work outside normal business hours, to be handled on
14 a special project basis and negotiated through a CCPM. As with all special
15 projects, this work would be subject to overtime billing as specified in the parties'
16 interconnection agreement.

17
18 Q. IS THE BATCH HOT CUT PROCESS MORE EFFICIENT FOR THE
19 CONVERSION OF AN EMBEDDED BASE OF UNE-P ORDERS TO UNE-L
20 ORDERS?

21
22 A. Yes, because it was designed specifically to handle large conversions of UNE-P
23 to UNE-L such as will be accomplished in the conversion of the embedded base.

24
25 Q. IS THERE COMMERCIAL USAGE OF BELLSOUTH'S BATCH HOT CUT

1 PROCESS?

2
3 A. Yes. Since bulk migration has been made available, there has been limited
4 activity requested by the CLECs. However, at the time of this filing, four (4) bulk
5 migration requests have been successfully ordered and completed.

6
7 Q. IN ADDITION TO OPERATIONAL EFFICIENCIES, ARE THERE RATE
8 ADVANTAGES TO THE BATCH PROCESS?

9
10 A. Yes. The rate for the batch hot cut is discussed in the testimony of BellSouth
11 witness John Ruscilli.

12
13 Q. DOES BELLSOUTH'S BATCH HOT CUT PROCESS INCLUDE LOOPS
14 SERVED BY INTEGRATED DIGITAL LOOP CARRIER ("IDLC")?

15
16 A. Yes. IDLC is a special version of DLC that does not require a host terminal in the
17 central office, sometimes referred to as the COT, but instead terminates the
18 digital transmission facilities directly into the central office switch. In its Texas
19 271 Decision, the FCC found that "the BOC must provide competitors with
20 access to unbundled loops regardless of whether the BOC uses integrated digital
21 loop carrier (IDLC) technology or similar remote concentration devices for the
22 particular loops sought by the competitor." Memorandum Opinion and Order,
23 *Application by SBC Communications Inc., et al., Pursuant to Section 271 of*
24 *Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in*
25 *Texas*, 15 FCC Rcd 18354, ¶ 248 (2000) ("*Texas Order*"). BellSouth provides

1 access to such IDLC loops via the following methods:

- 2 • Alternative 1: If sufficient physical copper pairs are available, BellSouth
3 will reassign the loop from the IDLC system to a physical copper pair.
- 4 • Alternative 2: Where the loops are served by Next Generation Digital Loop
5 Carrier (“NGDLC”) systems, BellSouth will “groom” the integrated loops to
6 form a virtual Remote Terminal (“RT”) arranged for universal service (that
7 is, a terminal which can accommodate both switched and private line
8 circuits). “Grooming” is the process of arranging certain loops (in the input
9 stage of the NGDLC) in such a way that discrete groups of multiplexed
10 loops may be assigned to transmission facilities (in the output stage of the
11 NGDLC). Both of the NGDLC systems currently approved for use in
12 BellSouth’s network have “grooming” capabilities.
- 13 • Alternative 3: BellSouth will remove the loop distribution pair from the
14 IDLC and re-terminate the pair to either a spare metallic loop feeder pair
15 (copper pair) or to spare universal digital loop carrier equipment in the
16 loop feeder route or Carrier Serving Area (“CSA”). For two-wire Integrated
17 Services Digital Network (“ISDN”) loops, the Universal Digital Loop Carrier
18 (“UDLC”) facilities will be made available through the use of Conklin
19 BRITEmux or Fitel-PMX 8uMux equipment.
- 20 • Alternative 4: BellSouth will remove the loop distribution pair from the
21 IDLC and re-terminate the pair to utilize spare capacity of existing
22 Integrated Network Access (“INA”) systems or other existing IDLC that
23 terminates on Digital Cross-connect System (“DCS”) equipment.
24 BellSouth will thereby route the requested unbundled loop channel to a
25 channel bank where it can be de-multiplexed for delivery to the requesting

CLEC or for termination in a DLC channel bank in the central office for concentration and subsequent delivery to the requesting CLEC.

- Alternative 5: When IDLC terminates at a switch peripheral that is capable of serving “side-door/hairpin” capabilities, BellSouth will utilize this switch functionality. The loop will remain terminated directly into the switch while the “side-door/hairpin” capabilities allow the loop to be provided individually to the requesting CLEC.
- Alternative 6: If a given IDLC system is not served by a switch peripheral that is capable of side-door/hairpin functionality, BellSouth will move the IDLC system to switch peripheral equipment that is side-door capable.
- Alternative 7: BellSouth will install and activate new UDLC facilities or NGDLC facilities and then move the requested loop from the IDLC to these new facilities. In the case of UDLC, if growth will trigger activation of additional capacity within two years, BellSouth will activate new UDLC capacity to the distribution area. In the case of NGDLC, if channel banks are available for growth in the CSA, BellSouth will activate NGDLC unless the DLC enclosure is a cabinet already wired for older vintage DLC systems.
- Alternative 8: When it is expected that growth will not create the need for additional capacity within the next two years, BellSouth will convert some existing IDLC capacity to UDLC.

The eight (8) alternatives for giving a CLEC access to loops served by IDLC listed above are listed in order of complexity, time, and cost to implement. The simplest is listed first and the most complex, lengthy, and costly to implement

1 listed last. Also, Alternative 1 and the copper loop solution of Alternative 3 do not
2 add additional Analog to Digital conversions. When a CLEC orders a loop,
3 BellSouth delivers that loop to the specifications ordered by the CLEC. Thus,
4 ordinarily BellSouth chooses the method for delivering the loop meeting the
5 ordered specification without involving the CLEC.

6
7 Q. WHAT HAPPENS IF ONLY ALTERNATIVES 7 OR 8 ARE AVAILABLE?

8
9 A. In that scenario, which BellSouth anticipates occurring very infrequently,
10 BellSouth will provide the CLEC two (2) choices – the CLEC may pay special
11 construction charges to build the necessary facilities, or BellSouth will provide the
12 CLEC a UNE-P at the Total Element Long-Run Incremental Cost (“TELRIC”)
13 rate. BellSouth only will make the second of these options available in those
14 areas in which it receives relief from unbundled switching.

15
16 Q. HAS THIS COMMISSION REVIEWED THESE EIGHT (8) ALTERNATIVES
17 PREVIOUSLY?

18
19 A. Yes. All nine of BellSouth’s states and the FCC considered and approved these
20 eight (8) alternatives for providing unbundled loops served via IDLC during
21 BellSouth’s Section 271 applications.

22
23 **II. SCALABILITY OF BELL SOUTH’S HOT CUT PROCESSES**

24
25 Q. IS BELL SOUTH’S INDIVIDUAL AND/OR BATCH HOT CUT PROCESS

1 SCALABLE TO MEET LOAD DEMAND THAT MIGHT RESULT IF BELLSOUTH
2 RECEIVES UNBUNDLED SWITCHING RELIEF?

3
4 A. Absolutely. BellSouth's systems and processes are scalable and the capacity of
5 those systems and processes may be readily increased as demand warrants. I
6 will address the scalability of the centers involved in the hot cut process, while
7 BellSouth witnesses Pate and Heartley address the scalability of the OSS and
8 network forces, respectively.

9
10 BellSouth's performance measurements demonstrate that BellSouth's LCSC and
11 CWINS organizations are staffed sufficiently to handle the current volumes of
12 unbundled loop orders. They also establish that BellSouth has scaled its
13 resources as necessary to handle changes in volumes of such orders over the
14 years. More fundamentally, the outstanding performance of the LCSC and
15 CWINS in handling both steady growth and spikes in demand makes clear that
16 BellSouth will continue to staff its LCSC and CWINS organizations sufficiently to
17 handle any reasonably foreseeable demand for hot cut conversions.

18
19 Finally, BellSouth has a strong incentive to ensure that the LCSC and CWINS
20 are adequately staffed to meet demand for all order types, including hot cut loops
21 in that BellSouth remains subject to penalties and voluntary payments under its
22 Self Effectuating Enforcement Measurements ("SEEMs") plan for performance
23 failures.

24
25 Q. FOR WHAT VOLUME LEVELS ARE THE CENTERS CURRENTLY STAFFED?

1 A. Current staffing of the LCSC and CWINS were predicated on expectation of
2 higher UNE loop conversion volumes than currently exist. There are three (3)
3 dedicated LCSCs (located in Atlanta, Georgia, Birmingham, Alabama and
4 Fleming Island, Florida) serving the CLEC community for preordering and
5 ordering. Further, there are two (2) dedicated CWINS operational centers
6 (located in Birmingham and Fleming Island) to perform hot cut coordination,
7 when required. These operational groups have currently redirected resources
8 due to lower than expected UNE conversion volumes. That means these
9 operational groups have the available capacity to reallocate these personnel at
10 such time that the UNE conversion volumes increase.

11
12 Q. CAN CENTERS PERSONNEL BE REALLOCATED AS PRODUCT DEMAND
13 CHANGES WITHOUT ADDITIONAL STAFFING?

14
15 A. Yes. The LCSC and CWINS personnel provide support across the entire range
16 of wholesale products and services BellSouth makes available. Any increase in
17 hot cut volumes resulting from the absence of UNE switching presumably would
18 be accompanied by a decrease in order types that rely on UNE switching (i.e.,
19 UNE-P), such that the resources currently dedicated to one could then be
20 devoted to the other. Initially, LCSC service reps are hired and trained in a single
21 product type, for example, residential resale or simple business resale or UNE-P.
22 As service representatives become more proficient with their initial discipline,
23 additional training to handle other types of order requests is provided. With this
24 cross training, many LCSC service representatives are able to handle multiple
25 types of service order requests thus enabling the LCSC organization to move

1 service representatives from one function to another. CWINS employees
2 complete various levels of technical classroom training, in addition to receiving
3 CWINS-specific training on the CLEC products or functions they are assigned to
4 support. CWINS employees therefore are capable of handling provisioning,
5 maintenance, and repair functions for a variety of wholesale products with
6 minimal additional on-the-job training. The CWINS reallocates its employees
7 among products as necessary to handle shifts in demand.

8
9 Q. IF UNBUNDLED CIRCUIT SWITCHING IS ELIMINATED IN CERAIN AREAS,
10 HOW WILL BELLSOUTH MEET THE DEMAND?

11
12 A. The LCSC and CWINS organizations use sophisticated force models to ensure
13 that their operations are adequately staffed to meet anticipated CLEC demand.
14 BellSouth's sustained level of performance for both UNE loops and hot cuts
15 validates that the current force models have been successful in meeting CLEC
16 service order demand with quality and reliability.

17
18 Q. DID BELLSOUTH DO A FORCE MODEL TO ANTICIPATE STAFFING NEEDS
19 ASSUMING THE ELIMINATION OF UNBUNDLED CIRCUIT SWITCHING?

20
21 A. Yes. Using an estimated volume of UNE-L orders that I will discuss later,
22 BellSouth ran the center's force model to determine anticipated staffing needs
23 assuming a worst case scenario.

24
25 Q. DOES BELLSOUTH OBTAIN CLEC FORECASTS TO ASSIST IN SCALING ITS

1 WORK FORCE?

2

3 A. BellSouth attempts to obtain such forecasts. Accurate and timely CLEC

4 forecasts help BellSouth plan for future hot cut volumes, but are not required for

5 the operation of its force models. CLECs are requested to provide a forecasted

6 number of unbundled loops a minimum of 30 days prior to submitting their first

7 unbundled loop order. After CLECs order their first unbundled loop, BellSouth

8 requests six-month interval forecasts by unbundled loop type and wire center.

9 Accurate and timely forecast information is helpful in assisting BellSouth meet

10 projected hot cut volumes; however, BellSouth force models are not dependent

11 upon receipt of such forecasts because CLECs generally do not provide such

12 forecasts.

13

14 Rather, as noted above, the force models automatically factor demand

15 projections based on historical trends into LCSC/CWINS staffing requirements.

16 BellSouth makes adjustments, as necessary, to handle sudden increases in

17 volume – and undertakes hiring initiatives as soon as it becomes apparent that

18 additional resources will be necessary to handle anticipated future demand.

19 Nonetheless, CLECs could help BellSouth anticipate and fulfill future staffing

20 needs by providing timely and accurate forecasts, especially for substantial

21 increases in volumes.

22

23 Q. WHAT DO YOU MEAN BY “WORST CASE” SCENARIO?

24

25 A. I am not using the term “worst case” in a negative or judgmental manner.

1 Rather, I am using it simply to refer to the maximum amount of hot cuts that the
2 LCSCs and CWINS Centers would reasonably be expected to handle if the
3 following were to occur:

- 4 1. This Commission finds that CLECs are not impaired without unbundled
5 switching (and thus, UNE-Ps) in any market in BellSouth's nine-state region.
- 6 2. CLECs decide to convert the totality of their UNE-P base to unbundled loops
7 attached to the CLECs' switches rather than BellSouth's switches.
- 8 3. UNE-P growth and UNE-L growth is maintained throughout the relevant
9 period for the absolute highest volumes of each that has occurred at any time
10 in the last 33 months that BellSouth has maintained records.

11
12 Q. WHAT MONTHLY VOLUME OF UNE-P TO UNE-L CONVERSIONS RESULTS
13 FROM YOUR ASSUMPTIONS?

14
15 A. The "worst case" monthly volume of hot cuts (except for adjustments to that
16 volume that I will discuss later in this testimony) is 317,998 across the entirety of
17 BellSouth's nine-state region. The following explains how I arrived at that value:

18
19 The highest single-month volume of UNE-Ps added (116,295) occurred in June
20 2002. The highest single-month volume of UNE-L inward movement (19,029)
21 occurred in January 2001. These "highest ever" volumes were assumed as
22 monthly growth going forward. The pictorial in Exhibit KLA-3, which is attached
23 to this testimony, depicts how those volumes grow over time.

24
25 Following is a brief explanation.

1 In October 2003, there were about 2.21million UNE-Ps in service region-wide.
2 Projecting forward for nine (9) months to July 2004 (the earliest expected
3 decision by a Public Service Commission in BellSouth's region), there would be
4 3.26 million UNE-Ps in service ($2.21M + (9 * 116,295)$). Because the conversion
5 of a BellSouth retail account to a UNE-P arrangement does not require a hot cut,
6 the monthly volume expected in July 2004 is equal to the quantity of "stand-
7 alone" unbundled loops requested (19,029).

8
9 Assuming that in July 2004, all nine Commissions in BellSouth's region decided
10 that CLECs are not impaired without unbundled switching and that CLECs may
11 continue to request UNE-Ps for an additional five (5) months, the expected
12 quantity of UNE-Ps in service in December 2004 would be 3.84 million. This
13 level of UNE-Ps becomes the "embedded base" which later will be converted to
14 stand-alone unbundled loops via the hot cut process. For the next eight (8)
15 months, the monthly volume of hot cuts would rise to 135,324. This is the sum of
16 the "worst case" unbundled loop volume (19,029) plus the "worst case" monthly
17 growth for UNE-Ps (116,295).

18
19 Beginning in August 2005, BellSouth would begin the transition of the embedded
20 base of UNE-Ps (3.84 million) plus handle the "worst case" monthly unbundled
21 loop volume (19,029) and the "worst case" monthly UNE-P growth volume
22 (116,295). During each of the subsequent seven-month intervals, BellSouth
23 would migrate one third of the embedded base. Thus, the "worst case" monthly
24 hot cut volume at the region level would be 317,998 (that is, $19,029 + 116,295 +$
25 $((3.84M * 0.333)/7)$)

1 Because on average there are 22.3 business days per month, the daily volume
2 becomes 14,260 (that is, 317,998 / 22.3) at the regional level.

3
4 Q. WHAT OTHER ADJUSTMENTS TO ANTICIPATED VOLUMES HAVE YOU
5 ASSUMED?

6
7 A. During CLEC workshops, CLECs have suggested that two adjustments should
8 be made to increase the anticipated volume of hot cuts by including: (1) some
9 level of “churn” from one local carrier to another; and (2) increased trouble
10 reports for unbundled loops compared to UNE-P arrangements. While I do not
11 necessarily agree with the CLECs’ suggestions, I have included those
12 adjustments to prove my point that BellSouth can expand its LCSC and CWINS
13 groups to handle hot cut volumes even when these additional factors are taken
14 into account. Accordingly, I made an upward adjustment of 4% churn per month
15 (48%) per year and an upward adjustment of 5% increased trouble report rate. I
16 treated these adjustments as if they resulted in additional hot cuts (again, a
17 “worst case” assumption) and the resultant monthly volume for hot cuts rose to
18 347,254 per month (15,572 per business day).

19
20 Q. WHAT ARE THE CENTERS’ INPUTS TO THE FORCE MODEL?

21
22 A. In order to ensure adequate staffing of the centers supporting CLECs, BellSouth
23 utilizes a work force model to anticipate staffing needs based on historical trends,
24 time and motion studies, internal forecasts, and targeted benchmarks. The work
25 force model provides a means to assure adequate staffing of BellSouth’s LCSC

1 and CWINS operations. The models utilize a forward-looking view of activity by
2 product type, which allows BellSouth sufficient time to hire and train personnel in
3 anticipation of any increase in activity. The force model has proved reliable. It
4 allowed BellSouth staff to meet tighter benchmarks for Firm Order Confirmations
5 (“FOCs”) and rejects for partially mechanized orders. BellSouth has clearly
6 demonstrated, through its performance data, that the infrastructure to handle
7 increasing levels of orders is in place and functioning at a very high level.
8

9 Q. WHAT ARE THE CENTERS’ STAFFING REQUIREMENTS FROM THE
10 MODEL?
11

12 A. Using daily volumes for Alabama (7.5% of all the UNE -Ps in BellSouth’s region)
13 means that BellSouth would have to hire and train 110 technicians in the CWINS
14 Centers and 27 service representatives in the LCSCs. Again, we have assumed
15 a worst-case scenario for the CWINS Centers that 50% of the migrations would
16 be coordinated and thus would require CWINS involvement. BellSouth expects
17 the number of coordinated migrations to be much less than this.
18

19 Q. HOW CAN THE CENTERS MEET THESE PROJECTED STAFFING LEVELS?
20

21 A. Force and load management is something BellSouth has been doing for
22 decades. BellSouth would hire the additional force by engaging its Human
23 Resources Department. Human Resources would advertise the jobs in local
24 media and conduct job fairs and testing events to screen applicants. Human
25 Resources would require 90 days from notification to employees being added to

1 the payroll.

2
3 Q. HAS BELL SOUTH EVER HIRED CENTER PERSONNEL IN SUCH VOLUMES
4 BEFORE?

5
6 A. Yes. During the time period 1998-2001, BellSouth hired and trained
7 approximately 2,000 service representatives and technicians for its Wholesale
8 operations.

9
10 Q. DOES BELL SOUTH HAVE TO HIRE ALL OF THESE PEOPLE AT ONCE?

11
12 A. No. The transition period for the embedded base of UNE-Ps in the Order is
13 almost two years away (August 2005) as shown in Exhibit KLA-3, so BellSouth
14 has an extended period of over which to add force if needed.

15
16 Q. ARE THESE FORECASTED VOLUMES REALISTIC?

17
18 A. No. First, as other BellSouth witnesses describe, BellSouth only is seeking
19 elimination of unbundled circuit switching in certain areas of the state. Thus,
20 BellSouth's assumption of UNE-L orders is high in that unbundled UNE-P will
21 continue to be available in some areas of the state. Second, whenever it had a
22 choice, BellSouth used the highest volume value available – highest UNE-Ps in a
23 month, etc. The point, however, is that if BellSouth can scale its forces to meet
24 the most unrealistic demand, it certainly can scale its forces to meet a more
25 realistic demand.

1 **III. REGIONALITY OF BELL SOUTH'S PROCESSES**

2
3 Q. ARE BELL SOUTH'S HOT CUT PROCESSES REGIONAL?

4
5 A. Yes. In the 271 cases, state commissions and the FCC held that BellSouth's
6 OSS (pre-ordering, ordering, provisioning, maintenance and repair, and billing)
7 are regional. For example, in the FCC's Five-state Order, (WC Docket No. 02-
8 260, ¶130) the FCC held "We find that BellSouth, through the Pricewaterhouse
9 Coopers (PwC) report, provides evidence that its OSS in Georgia are
10 substantially the same as the OSS in each of the five states."

11
12 Further, in CC Docket No. 02-35 (GA/LA Order) at ¶111, the FCC held that "[t]he
13 record indicates ... BellSouth has provided detailed information regarding the
14 "sameness" of BellSouth's systems in Georgia and Louisiana, including their
15 manual systems and the way in which BellSouth personnel do their jobs.
16 Accordingly, we find that BellSouth, through the PwC audit and its attestation
17 examination, provides evidence that its OSS in Georgia are substantially the
18 same as the OSS in Louisiana. We shall consider BellSouth's commercial OSS
19 performance in Georgia and the Georgia third-party test to support the Louisiana
20 application and rely on Louisiana performance to support the Georgia
21 application."

22
23 Q. DOES BELL SOUTH PERFORM ITS HOT CUT PROCESSES THE SAME WAY
24 IN ALL NINE OF ITS STATES?

1 A. Yes it does.

2

3 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

4

5 A. Yes.